Remarks

Reconsideration of the above-identified application is respectfully requested. Claims 1, 4-6 and 9-22 are pending in this application.

In the Office Action mailed May 11, 2005, the Examiner objected to claim 1 based on a typographical error. In response, pursuant to 37 C.F.R. §1.116, the Applicants respectfully request entry of the amendment to claim 1 as shown above to correct that typographical error, as that amendment is believed to place the application in condition for allowance or in better form for consideration on appeal. In view of that amendment, reconsideration of the Examiner's objection to claim 1 is respectfully requested.

In that same Office Action, the Examiner also finally rejected claims 1, 4-6 and 9-22 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,379,391 ("the '391 patent"). The Applicants respectfully traverse that rejection and request reconsideration thereof for the reasons set forth below.

Rejection of Claims 1, 4-6 and
9-22 Under 35 U.S.C. §102(b)

As noted above, in the May 11, 2005 Office Action, the Examiner finally rejected claims 1, 4-6 and 9-22 under §102(b) as anticipated by the '391 patent. The Applicants believe, however, that the claimed invention is not anticipated by that reference.

In that regard, the '391 patent is directed to accessing a data record in a cache memory by multiple virtual addresses. Rather than making a copy of a data record in cache memory, those portions of the '391 patent cited by the Examiner relate to making a copy of a data record in the virtual storage system by generating a pointer to reference the same physical memory location of that data record.

In contrast, the Applicants' claimed invention provides for portions of a cache holding data objects to be shared when the data objects are copies of each other. As recited

for example in independent claim 1, this is accomplished by staging a data object associated with first virtual addresses into a cache, and generating a pointer for use in pointing to that data object staged in the cache when a storage device location identifier of a data object associated with a second virtual address matches that of the data object associated with the first virtual address.

While the '391 patent discusses staging a data record into cache memory, it does not do so in the context of the Applicants' claimed invention. Instead, the '391 patent discloses managing multiple memory pointers to prevent an original data record or a copy of that data record stored in cache memory from being modified without a loss of data consistency. In that regard, the hash table and collision list of the '391 patent are simply a mechanism for finding the data record in the cache memory. The '391 patent is therefore unrelated to and not the same as the Applicants' claimed invention.

Thus, the '391 patent fails to anticipate the Applicants' claimed invention as recited in independent claims 1, 6, 11 and 17. Reconsideration of the Examiner's rejection of those claims under §102(b) is therefore respectfully requested.

Claims 4, 5, 9, 10, 12-16 and 18-22 depend either directly or indirectly from independent claims 1, 6, 11 or 17, respectively, and include all the limitations thereof. As a result, and in light of the foregoing remarks concerning claims 1, 6, 11 and 17, the Applicants believe that claims 4, 5, 9, 10, 12-16 and 18-22 likewise overcome the Examiner's rejection thereof under §102(b), and reconsideration of that rejection is also respectfully requested.

Conclusion

For at least the foregoing reasons, the Applicants believe that claims 1, 4-6 and 9-22 meet both the formal and substantive requirements for patentability, and that the application is in condition for allowance. Accordingly, such action by the Examiner is respectfully requested.

If a telephone conference would expedite allowance or resolve any additional questions, such a call is invited at the Examiner's convenience.

Respectfully submitted,

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